

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRIAN FLORES, STEVE WILKS and RAY
HORTON, as Class Representatives, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE; NEW
YORK FOOTBALL GIANTS, INC. d/b/a NEW
YORK GIANTS; MIAMI DOLPHINS, LTD. d/b/a
MIAMI DOLPHINS; DENVER BRONCOS
FOOTBALL CLUB d/b/a DENVER BRONCOS;
HOUSTON NFL HOLDINGS, L.P. d/b/a
HOUSTON TEXANS; ARIZONA CARDINALS
FOOTBALL CLUB LLC d/b/a ARIZONA
CARDINALS; TENNESSEE TITANS
ENTERTAINMENT, INC. d/b/a TENNESSEE
TITANS and JOHN DOE TEAMS 1 through 26,

Defendants.

Civil Action No.: 22-cv-00871 (VEC)

DEFENDANTS' RULE 7.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants hereby certify
that:

1. The National Football League is an unincorporated association with no parent corporations. There are no publicly held corporations with an ownership interest of 10% or more in the National Football League.
2. Miami Dolphins, Ltd. is controlled by Fin Associates, LLC, a private limited liability company, which is controlled by Fin 2016, LLC, a private limited liability company.
3. Denver Broncos Team, LLC, d/b/a Denver Broncos Football Club, is a subsidiary of Broncos Holdings, LLC, a private limited liability company.

4. Tennessee Football, Inc. (incorrectly identified in the Complaint as “Tennessee Titans Entertainment, Inc.”) is a subsidiary of KSA Industries, Inc., a private corporation.

5. Other than what is listed above, no Defendant has a parent corporation and no publicly held corporation has an ownership interest of 10% or more in any Defendant.

Dated: New York, New York
August 29, 2022

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Loretta E. Lynch
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